

1
2
3
4
5
6
7
8
9
10
11 UNITED STATES DISTRICT COURT
12 FOR THE WESTERN DISTRICT OF WASHINGTON
13

14
15 CHRISTOPHER C. JOHNSON,

16 Plaintiff,

17 v.

18 THE CBE GROUP, INC.,
19

20 Defendants.

CASE NO. 3:25-cv-05392-DGE

ANSWER

21 **DEFENDANT CBE GROUP, INC.'S ANSWER TO PLAINTIFF'S COMPLAINT**
22

23 TO THE HONORABLE JUDGE OF SAID COURT:
24

25 COMES NOW, Defendant CBE Group, Inc. ("Defendant"), by and through its
26 undersigned counsel, and files its Answer to Plaintiff Christopher C. Johnson
27 ("Plaintiff")'s Complaint ("Complaint") as follows:
28

INTRODUCTION

- ANSWER -
- PAGE 1 of 5-

THE O'MEARA LAW OFFICE
Michael O'Meara
1602 Virginia Ave
Everett, WA 98201
425.263.1732
michael@omearalawoffice.com

1. Defendant admits that Plaintiff brings this action under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (“FCRA”). Defendant denies that it committed any violation of the FCRA.

BASIS OF JURISDICTION

2. Defendant lacks knowledge or information sufficient to form a belief about the truth of Paragraph 2; therefore, it denies the same.

PARTIES

3. Defendant lacks knowledge or information sufficient to form a belief about the truth of Paragraph 3; therefore, it denies the same.

4. Defendant admits that Paragraph 4.

5. Defendant admits that, as a corporation, it can only act through its owners, officers, agents, and employees, but only to the extent that they act upon and within their scope of authority.

FACTUAL ALLEGATIONS

6. Defendant lacks knowledge or information sufficient to form a belief about the truth of Paragraph 6; therefore, it denies the same.

7. Defendant lacks knowledge or information sufficient to form a belief about the truth of Paragraph 7; therefore, it denies the same.

8. Defendant denies Paragraph 8.

9. Defendant denies Paragraph 9.

10. Defendant denies Paragraph 10.

11. Defendant denies Paragraph 11.

1 12. Defendant denies Paragraph 12.

2 13. Defendant denies Paragraph 13.

3 14. Defendant denies Paragraph 14.

4 15. Defendant denies Paragraph 15.

5 16. Defendant denies Paragraph 16.

6 17. Defendant denies Paragraph 17.

7 18. Defendant denies Paragraph 18.

8 19. Defendant denies Paragraph 19.

9 20. Defendant denies Paragraph 20.

10 21. Defendant denies Paragraph 21.

11 22. Defendant denies Paragraph 22.

12 23. Defendant denies Paragraph 23.

13 24. Defendant denies Paragraph 24.

14 25. Defendant denies Paragraph 25.

15 26. Defendant denies Paragraph 26.

16 **COUNT I**

17 27. Defendant reasserts and re-alleges its responses and defenses as set forth herein.

18 28. Defendant lacks knowledge or information sufficient to form a belief about the
19 truth of Paragraph 28; therefore, it denies the same.

20 29. Defendant denies Paragraph 29.

21 30. Defendant denies Paragraph 30.

22 31. Defendant denies Paragraph 31.

1 32. Defendant denies Paragraph 32.

2 33. Defendant denies Paragraph 33.

3 34. Defendant denies Paragraph 34.

4 35. Defendant denies Paragraph 35.

5 36. Defendant denies Paragraph 36.

6
7
8 **COUNT II**

9 37. Defendant denies Paragraph 37.

10 38. Defendant denies Paragraph 38.

11 39. Defendant denies Paragraph 39.

12
13 **JURY DEMAND AND PRAYER FOR RELIEF**

14 40. Defendant admits that Plaintiff seeks a jury trial in this matter. Defendant denies
15 Plaintiff's Prayer for Relief, and its subparts, and denies that Plaintiff is entitled to any
16 relief or damages from Defendant.
17

18
19 **AFFIRMATIVE DEFENSES**

20 41. Any violation of the FCRA, if it occurred, was the result of a bona fide error.

21 42. Plaintiff's damages, if any, are the result of the actions of third parties over whom
22 Defendant has no control.
23

24 43. Plaintiff's damages, if any, were pre-existing damages not caused by Defendant.

25 44. Plaintiff has failed to mitigate damages, if any.

26 45. Plaintiff's proximately caused his own damages, if any.
27
28

1 WHEREFORE, PREMISES CONSIDERED, Defendant respectfully prays that
2 Plaintiff takes nothing herein, that Defendant be dismissed with its costs, and all other
3 and further relief, at law or in equity, to which Defendant may be justly entitled.
4

5
6 Dated: June 9, 2025.

Respectfully submitted,
7

8
9
10
11 ***COUNSEL FOR DEFENDANT***
12 ***THE CBE GROUP, INC.***
13

14
15 **CERTIFICATE OF SERVICE**
16

17 The undersigned certifies that he forwarded a copy of the foregoing pleading to
18 all parties entitled to notice of same via **CM/ECF** on this 9 June 2025:
19
20
21
22
23
24
25
26
27
28